

## **REMARKS**

In the Office Action, the Examiner rejected Claims 1-19 under 35 U.S.C. §102 as being fully anticipated by U.S. patent application publication no. 2004/0181753 (Michaelides), and rejected Claim 20 under 35 U.S.C. §103 as being unpatentable over Michaelides in view of U.S. Patent 6,704,743 (Martin). Claims 7-18 were further rejected under 35 U.S.C. 101 as being directed to non-statutory subject matter, and the Examiner objected to the specification as not providing the proper antecedent basis for the claimed subject matter.

Independent Claims 1, 7 and 13 are being amended to better define the subject matters of these claims. Claims 10 and 11 are being amended to keep the language of these claims consistent with the language of amended Claim 7. Claims 2, 3, 19 and 20 are being canceled because the limitations of these claims have been added to Claim 1. Claims 8 and 9 are being canceled because the limitations of these claims are being included in Claim 7, and Claims 14 and 15 are being canceled because the limitations of these claims have been added to Claim 13.

With respect to the rejection of Claims 7-12 under 35 U.S.C. 101, the Examiner argued that these claims do not contain any physical hardware to perform the claimed mapping, and are merely software per se.

The preambles of Claims 7, 10, 11 and 12 are being amended to indicate that the claims are directed to “A Computer system.” In addition, Claim 7 is being amended to positively set forth a computer server and to indicate that the plurality of components described in the claim operate on that server. A computer server and the operation of the components on that server are discussed in the specification in paragraph (22).

As amended herein, Claims 7, 10, 11 and 12 now indicate specific physical structure – the server – to perform the functions described in the claims. Accordingly, these claims now

clearly define statutory subject matter within the meaning of 35 U.S.C. 101, and the Examiner is respectfully asked to reconsider and to withdraw the rejection of Claims 7, 10, 11 and 12 under 35 U.S.C. 101.

In rejecting Claims 13-18 under 35 U.S.C. 101, the Examiner argued that these claims recite subject matters such as “a program storage device” and “machine” that are not defined in the instant specification.

Applicants are changing “machine” to “computer” in Claim 13. The term “computer” is well known and understood in the art and is clearly an apparatus within the meaning of 35 U.S.C. 101. Because of this, Claims 13, 16, 17 and 18 are not rendered non-statutory because of the recitation of a “computer” in Claim 13.

With respect to the phrase “program storage device,” this phrase is a common expression and, in the context of the present application, is well understood by those of ordinary skill in the art. For instance, a word search through the US PTO Web site shows that the phrase “program storage device” is found in the claims of more than 3900 US patents. Furthermore, the claims of the present application – which form part of the disclosure – expressly describe what the purpose of the program storage device is.

This program storage device is, as described in amended Claim 13, “readable by a computer, tangibly embodying a program of instructions executable by the computer to perform method steps for mapping data from a data source to a data destination.” Thus, as described in the claims, the program storage device produces a tangible, concrete and useful result. Specifically, this device tangibly embodies a program of instructions, executable by a computer to achieve a specific, useful and concrete result – mapping data from a data source to a data destination.

The term “program storage device,” as used in the present application, is well understood by those of ordinary skill in the art, and, further, is an article of manufacture within the meaning of 35 U.S.C. 101.

For these reasons discussed above, Claims 13, 16, 17 and 18 define statutory subject matter within the meaning of 35 U.S.C. 101, and the Examiner is asked to reconsider and to withdraw the rejection of these claims under 35 U.S.C. 101.

In the Office Action, the Examiner also objected to the specification as not providing the proper antecedent bases for all the claimed subject matter. The Examiner, in particular, argued that the claimed subject matters such as “program storage device” and “machine” are lacking of antecedent basis. These terms occur in the preamble of Claim 13.

Applicants are herein amending the Summary of the Invention, and in particular, paragraph (7) of the specification to provide the appropriate support for the preamble of Claim 13, care being taken to avoid adding new matter.

In particular, the preamble of Claim 13, as amended herein, describes the invention as a “program storage device readable by computer, tangibly embodying a program of instructions executable by the machine to perform method steps for mapping data from a data source to a data destination.” This quoted language is being added to the end of paragraph (7) of the specification, and thus this paragraph now provides the appropriate support for the language used in the preamble of claim 13. In addition, because this language being added to paragraph (7) is being taken directly from Claim 13, no new matter is being added to paragraph (7).

With these changes, the specification now provides the appropriate antecedent basis for all the claimed subject matter, and the Examiner is thus also asked to reconsider and to withdraw the objection to the specification.

Moreover, Claims 1, 4-7, 10-13, and 16-18 patentably distinguish over the prior art and are allowable for the reasons discussed below. Consequently, the Examiner is respectfully asked to reconsider and to withdraw the rejection of Claims 1, 4-7, 10-13, and 16-18 under 35 U.S.C. §102 and to allow these Claims.

As explained in detail in the present application, this invention relates to mapping data from a source to a destination, and in particular, to doing this in a way that makes it easy to work with different types of data sources. This is done by providing a framework, or system, having a group of components, each of which can be readily modified or replaced independent of the other components, for handling various functions as data are mapped from the source to the destination. More specifically, the first component is used for reading the data from the source, and the second component is used for receiving the data from the first of the components and for processing the read data according to a set of rules. The third component is used for receiving the data from the second of the components and for loading the data into the data destination.

Mapping data in this way allows, for example, one application to be accessed by different users in different parts of the world even though those users might use different formats for dates, time and money, or for other reasons. Also, the present invention can map data in different formats into a single, common database by simply changing or replacing the appropriate component of the mapping process used with a particular individual. For example, the above-mentioned second component of the system includes a formatter for converting selected dates from a first format to a second format. The use of this formatter in this way

eliminates the need for writing code for formatting dates.

The use of multiple, independent components allows the present invention to achieve a very high level of functionality – that is, the components can do a considerable amount of processing. For instance, with the present invention, these components, in addition to formatting data as the data are passed from the data source to the data destination, can also manage transactions. To do this, a transaction is started when a first record is read and the transaction is committed when a defined record, as defined in a record parameter, is encountered.

The prior art of record does not disclose or render obvious using the above-described components to, in addition to formatting data, manage transactions.

For example, Michaelides describes a software tool for converting a source format to a target format. As shown in Figure 6 of Michaelides, this software tool is comprised of a series of functional blocks, including a transformation engine, a formatting engine, a user interface, a feed database and a rule database. These functional blocks, however, do not operate in an independent manner, as the components of the present invention do. Specifically, the functional blocks of Michaelides use rules from other functional blocks to process the data; and because of this, a change in one functional block may have a direct affect on the specific way another functional block operate.

Martin, who was cited in support of the rejection of Claim 20, describes a method and system for managing entities in an object-oriented environment, in which parameters or fields are selectively inherited from parent entities and into child entities. This inheritance is responsive to persistent indications of the inheritability of such parameters or fields stored in memory. In the disclosed procedure, entities from an object-oriented environment in a computer system are managed by creating a child entity based on a parent entity for which a persistent representation

has been created in a non-volatile memory in the computer system. This non-volatile memory may be accessed to determine whether a parameter for the parent entity is inheritable. In addition, the parameter is inherited into the child entity if the parameter for the parent entity is determined to be inheritable.

Martin was cited primarily for the teaching of verifying the integrity of read data by checking for counts and data consistencies.

Independent Claims 1, 7 and 13 are being amended to elaborate on the above-discussed difference between the present invention and the prior art. In particular, as amended herein, each of these claims positively sets forth the limitation that the separate components, among other functions, manage transactions by starting a transaction when a first record is read, and committing the transaction when a defined record, as defined in a record parameter, is encountered.

The other references of record have been reviewed, and these other references, whether considered individually or in combination, also do not disclose or suggest this feature of the present invention.

Because of the above-discussed differences between Claims 1, 7 and 13 and the prior art, and because of the advantages associated with those differences, these claims are not anticipated by and are not obvious in view of the prior art. Accordingly, Claims 1, 7 and 13 patentably distinguish over the prior art and are allowable. Claims 4, 5 and 6 are dependent from, and are allowable with, Claim 1; and Claims 10, 11 and 12 are dependent from Claim 7 and are allowable therewith. Also, Claims 16, 17 and 18 are dependent from, and are allowable with, Claim 13. The Examiner is, accordingly, respectfully requested to reconsider and to withdraw the rejection of Claims 1, 4-7, 10-13, and 16-18 under 35 U.S.C. 102, and to allow these Claims.

For the reasons set forth above, the Examine is asked to reconsider and to withdraw the objection to the specification, and the rejection of Claims 7, 10-13, and 16-18 under 35 U.S.C. 101. The Examiner is also requested to reconsider and to withdraw the rejection of Claims 1, 4-7, 10-13, and 16-18 under 35 U.S.C. 102, and to allow Claims 1, 4-7, 10-13 and 16-18. If the Examiner believes that a telephone conference with Applicants' Attorneys would be advantageous to the disposition of this case, the Examiner is requested to telephone the undersigned.

Respectfully submitted,

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